

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
	:	
Michael J. Cunnane	:	Case No.: 20-10957-mdc
Susan J. Cunnane	:	
	:	
Debtor(s)	:	Chapter 13

MOTION TO MODIFY PLAN AFTER CONFIRMATION

The Debtors, Michael and Susan Cunnane, by and through their undersigned counsel, hereby move to modify their Chapter 13 Plan and in support thereof aver as follows:

1. Debtors filed a Chapter 13 Bankruptcy on or about February 17, 2020.
2. The Chapter 13 filing was assigned case number 20-10957-mdc.
3. The Chapter 13 Plan was confirmed by this Honorable Court on or about June 25, 2020.
4. On or about March 25, 2021, the Internal Revenue Service filed an amended proof of claim 7-3.
5. The Debtors therefore request to modify the confirmed Chapter 13 Plan, to include the amended claim filed by the Internal Revenue Service.
6. In furtherance of the Debtors including the amended claim in their plan, this Motion and Modified Chapter 13 Plan are being contemporaneously filed.
7. The Debtors' proposed modified Chapter 13 Plan, attached hereto as "**Exhibit A**", includes the Internal Revenue Service's amended proof of claim and is affordable by the Debtors.

WHEREFORE, the Debtors request that they be permitted to modify their Chapter 13 Plan for the above-stated reasons.

Dated: March 29, 2021

/s/Brad J. Sadek, Esq.
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